

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON &  
HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

***EXPEDITED***

**[ASSENTED TO] MOTION TO EXTEND TIME TO FILE OBJECTION TO THE MOTION  
TO DISMISS FILED BY THE HILLIARD DEFENDANTS**

1. I respectfully submit this assented to motion for an extension of time until December 4, 2023 to file an objection to the motion to dismiss filed by Russell Hilliard and Upton & Hatfield (“the Hilliard defendants”).
2. The Hilliard defendants filed their motion to dismiss on 10/26/23.
3. The Hilliard defendants’ motion to dismiss has a response deadline automatically set for 11/9/23.
4. I hereby request an extension until 12/4/23.
5. The defense counsel has assented to this request. See **Exhibit 1**.
6. Accordingly, I respectfully request that the Court allow this motion.
7. I ask the court to enter an order as soon as possible given the assent of the defense counsel and so I can know how to proceed in adequate advance of the deadline.

Respectfully submitted,

/s/ Andre Bisasor

Andre Bisasor

679 Washington Street, Suite # 8-206

Attleboro, MA 02703

T: 781-492-5675

Email: [quickquantum@aol.com](mailto:quickquantum@aol.com)

November 3, 2023

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served to the defendants in this case.

/s/ Andre Bisasor

Andre Bisasor

679 Washington Street, Suite # 8-206

Attleboro, MA 02703

T: 781-492-5675

Email: [quickquantum@aol.com](mailto:quickquantum@aol.com)

## **EXHIBIT 1**

RE: time to oppose your motion to dismiss

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From: Sonneborn, Daniel R. (dsonneborn@preti.com)

To: quickquantum@aol.com

Date: Friday, November 3, 2023 at 10:55 AM EDT

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Andre,

Dec. 4<sup>th</sup> is fine. You can request the additional time via motion and note I assent to the date.

Thanks,  
Dan

**Daniel R. Sonneborn**  
Director  
PretiFlaherty

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**From:** Andre Bisasor <quickquantum@aol.com>

**Sent:** Friday, November 3, 2023 10:55 AM

**To:** Sonneborn, Daniel R. <DSonneborn@preti.com>

**Subject:** Re: time to oppose your motion to dismiss

**Note: \*\*\* This email originated from outside of Preti. Please do not click on any links or open attachments unless you can verify the sender and content.\*\*\***

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Dan, can you let me know as soon as possible? Andre

On Friday, November 3, 2023 at 09:33:29 AM EDT, Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)> wrote:

Could we do the Monday (Dec 4) following that Thursday (Nov 30)?

-Andre

On Friday, November 3, 2023 at 09:26:30 AM EDT, Sonneborn, Daniel R. <[dsonneborn@preti.com](mailto:dsonneborn@preti.com)> wrote:

Andre,

Can we agree to November 30?

Thanks,

Dan

**Daniel R. Sonneborn**  
Director  
PretiFlaherty

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**From:** Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)>  
**Sent:** Friday, November 3, 2023 8:36 AM  
**To:** Sonneborn, Daniel R. <[DSonneborn@preti.com](mailto:DSonneborn@preti.com)>  
**Subject:** Re: time to oppose your motion to dismiss

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30 days from the current deadline.

-Andre

On Friday, November 3, 2023 at 07:56:10 AM EDT, Sonneborn, Daniel R. <[dsonneborn@preti.com](mailto:dsonneborn@preti.com)> wrote:

Andre,

Are you asking for 30 days from the date I filed or 30 days from the current deadline?

Thanks,

Dan

**Daniel R. Sonneborn**  
Director  
617.226.3852 Tel  
[dsonneborn@preti.com](mailto:dsonneborn@preti.com)  
[Bio](#) | [LinkedIn](#) | [Twitter](#) | [preti.com](https://preti.com)

PretiFlaherty  
60 State Street  
Suite 1100  
Boston, MA 02109

On Nov 2, 2023, at 9:01 PM, Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)> wrote:

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Dan, can you please reply.

-Andre

On Wednesday, November 1, 2023 at 10:40:31 AM EDT, Andre Bisasor <[quickquantum@aol.com](mailto:quickquantum@aol.com)> wrote:

Dan,

As discussed before, I would like to extend the time to oppose your motion to dismiss. I am seeking 30 days extension. Will you assent? NB: You'd indicated that after you file, I should reach out to you to let you know how much time I would seek.

Please let me know asap.

Thanks,

Andre

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